

03-MDL-1570 (GBD)(SN)

In re: TERRORIST ATTACKS ON SEPTEMBER 11, 2001

DEFENDANT JELAIDAN'S MOTION TO STAY ORDER FOR DEPOSITION ON
NOVEMBER 25-26, 2019

Comes now Defendant Wael Jelaidan, through undersigned counsel, and hereby requests an stay of the Court's order for Defendant's deposition, for the reasons stated herein.

As the Court knows, the Defendant's deposition is scheduled for November 25 and November 26, 2019 in Jeddah Saudi Arabia.

Defendant's counsel, who had intended to participate in the deposition via teleconference, was informed Friday morning, November 22, 2019 that his brother had passed away overnight Thursday November 21, 2019.

This unfortunate turn of events makes it impossible for undersigned counsel to participate in the deposition, as he will be tied up with his brother's funeral and a number of legal issues arising therefrom.

Undersigned counsel informed Plaintiffs' counsel at 10:41 am today of his brother upcoming funeral, shortly after he received the news of his death. Counsel has repeatedly called Plaintiff's counsel with respect to advising the court of this development, to no avail.

Under the circumstances of Defendant's counsel's unavailability, plus the issue of who can attend the deposition (included in ECF 5301), filed November 21, 2019, it appears impossible for the deposition to go forward as scheduled at this time.

Defendant's counsel asks the court to postpone the deposition to a mutually agreeable time that can be arranged in the future.

Respectfully submitted,

Martin F. McMahon, Esquire

/s/ Martin McMahon

Martin F. McMahon & Associates

1717 K Street, N.W., Suite 900

Washington, D.C. 20006

(202) 862-4343

mm@martinmcmahonlaw.com

Counsel for Defendant Wael Jelaidan

03-MDL-1570 (GBD)(SN)

In re: TERRORIST ATTACKS ON SEPTEMBER 11, 2001

PROPOSED ORDER

Upon consideration of Defendant Jelaidan's Motion to Stay Court's Order for Deposition on November 25-26, 2019, it is hereby ORDERED this ____ day of November 2019, this Court's order filed on November 1, 2019 is hereby stayed until Counsel can set a mutually acceptable time for the deposition.

SO ORDERED.

United States District Judge

CERTIFICATE OF SERVICE

I certify that on November 22, 2019 I filed the foregoing pleading with the Clerk of Court using the electronic filing system CM/ECF, which will presumably send a copy of this file to all parties registered to receive it, including counsel of record.

/s/ Martin F. McMahon